



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

MAR 28 2016

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-101

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION

Mr. Tim Cook
Supervisor
Alaska Airlines Ketchikan Station
P.O. Box 68900 SEAZE
Seattle, Washington 98168

Re: Alaska Airlines Ketchikan Station
Multi-Sector General Permit Number AKR06AC10,
Previous Multi-Sector General Permit Number AKR05CD16

Dear Mr. Cook:

On August 31, 2015, the United States Environmental Protection Agency (EPA) visited Alaska Airlines Ketchikan Station ("Facility") in Ketchikan, Alaska. The purpose of this inspection was to determine the Facility's compliance with the requirements of the Clean Water Act (CWA) and the Multi-Sector General Permit that covers the Facility, Multi-Sector General Permit Number AKR06AC10 (MSGP) for storm water discharges as an Air Transportation Facility (Sector S). I would like to express my appreciation for your staff's time and cooperation during the inspection.

AUGUST 2015 INSPECTION

AREAS OF CONCERN

1. Part 1.6.1 of Appendix A of the MSGP states that the permittee shall at all times properly operate and maintain all facilities and systems of treatment and control and related appurtenances that the permittee installs or uses to achieve compliance with the conditions of the permit.

At the time of the inspection, the inspector noted that Facility representatives were uncertain whether or not maintenance had been performed on the 20,000 gallon oil-water separator that treats storm water from the trench prior to discharge off-site. According to the Facility, Ketchikan Gateway Borough (KGB) is responsible for maintaining the system.

2. Part 1.12.5 of Appendix A of the MSGP states that any person signing a document under Appendix A, Part 1.12.2 or Part 1.12.3 shall certify as follows:
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

At the time of the inspection, the inspector noted that one of the individuals that had signed and completed the most recent inspection report had a job title listed as "Ramp Services" on the training log. It does not appear that this individual meets the permit criteria to make him eligible to certify the inspection reports.

VIOLATIONS

1. Part 5.2.3.3 of the MSGP states, in part, that the SWPPP site map must include locations of all storm water conveyances including ditches, pipes, and swales.

Part 5.2.4 of the MSGP states, in part, that the permittee must document areas at their facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released.

At the time of the inspection, the Facility representatives were uncertain where the floor drains route to inside the air cargo building, warehouse, and GSE shop. Drainage from the buildings is not addressed in the SWPPP. Similarly, the inspector noted a drain inside the secondary containment where a 200 gallon split fuel tank was located. The drain was not shown on the site map and it is unclear where it routes. These are violations of Parts 5.2.3.3 and 5.2.4 of the MSGP.

2. Part 7.2 of the previous MSGP (AKR05CD16) states, in part, that the permittee must submit an annual report to EPA that includes the findings from your Part 4.3 comprehensive site inspection and any corrective action documentation as required in Part 3.4. You must submit the annual report to EPA within 45 days (postmark date) after conducting the comprehensive site inspection to the address identified in Part 7.6.1.

At the time of the inspection, the inspector noted that the 2014 Annual Report was not on-file.

3. Part 5.2.2 of the MSGP states that the permittee must identify the staff members (by name or title) that comprise the facility's storm water pollution prevention team as well as their individual responsibilities. The storm water pollution prevention team is responsible for assisting the facility manager in developing and revising the facility's SWPPP as well as maintaining control measures and taking corrective actions where required. Each member of the storm water pollution prevention team must have ready access to either an electronic or paper copy of applicable portions of this permit and the SWPPP.

Part 11.S.3.3 of the MSGP states, in part, that the airport authority, in collaboration with its tenants, may choose to develop a single comprehensive SWPPP, or they may choose to develop individual SWPPP.

Part 11.S.3.4 of the MSGP states, in part, that each individual operator remains responsible for ensuring all requirements of its own MSGP are met regardless of whether the comprehensive SWPPP allocates the actual implementation of any of those responsibilities to another entity.

At the time of the inspection, the SWPPP showed that the Customer Services Manager was responsible for quarterly monitoring and Discharge Monitoring Report (DMR) preparation and submittal. However, Facility representatives told the inspector that Alaska Airlines does not complete quarterly visual assessments or discharge sampling because those responsibilities fall under the Ketchikan International Airport SWPPP. The SWPPP does not reflect actual operations and is a violation of Part 5.2.2 of the MSGP. These are violations of Parts 5.2.2, 11.S.3.3, and 11.S.3.4 of the MSGP.

4. Part 11.S.6.1 of the MSGP states that the permittee must, at a minimum, conduct routine facility inspections at least monthly during the deicing season (e.g., October through April for most airports).

Part 6.1.2 of the MSGP states that a permittee must document the findings of each routine facility inspection performed and maintain this documentation onsite with the SWPPP as required in Part 5.8. The permittee is not required to submit their routine facility inspection findings to DEC, unless specifically requested to do so.

The inspection report must be signed and certified in accordance with Appendix A, Subsection 1.12 of the permit.

At the time of the inspection, the inspector noted that there were no facility reports on file for November 2012; January, June, and July 2013; and from November 2013 through March 2015. The inspections for the stated months were not with the SWPPP. These are violations of Parts 11.S.6.1 and 6.1.2 of the MSGP.

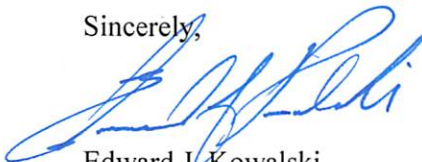
At the time of the Ketchikan International Airport (KIA) inspection, the inspector noted that Alaska Airlines (AS) was not mentioned in the KIA SWPPP. KIA shares its quarterly visual assessment findings with AS as a courtesy; however, the responsibility for ensuring that the assessment has been completed and the paperwork properly filled out, and submitted, rests with Alaska Airlines.

On December 21, 2015, the NPDES Electronic Reporting Rule became effective. Permittees with a DMR requirement will have one year from this date to submit DMRs through NetDMR. Additional information is enclosed (Enclosure A).

Although our goal is to ensure NPDES facilities comply fully with their permits, the ultimate responsibility rests with the permittee. As such, I want to strongly encourage you to continue your efforts to maintain full knowledge of the Permit requirements, and other appropriate statutes, and to take appropriate measures to ensure compliance. Notwithstanding your response to this letter, EPA retains all rights to pursue enforcement actions to address these and any other violations.

I have enclosed a copy of the inspection report (Enclosure B). If you have any questions concerning this matter, please do not hesitate to contact Raymond Andrews of my staff at (206) 553-4252.

Sincerely,



Edward J. Kowalski
Director

Enclosures

cc: Michael Solter
Alaska Department of Environmental Conservation
michael.solter@alaska.gov

Jason Brown
Environmental Affairs Manager
Alaska Airlines, Inc., Juneau Station, Alaska
jason.brown@alaskaair.com